From: Moore, Gary
To: Terry Andrews

Cc: <u>Brenda P. Basile, PhD (brenda.basile@pbwllc.com)</u>; <u>Salinas, Amy</u>

Subject: Re: CES update needed

Date: Tuesday, January 20, 2015 12:56:05 PM

Terry:

This is the update:

CES Environmental Services, Inc.

The EPA mobilized to the Site on September 3, 2014 and began addressing the wastes and spills located on site.

As of January 16, the EPA Team has addressed the following:

- Vacuum Boxes (original): 12 of 12 Vacuum Boxes (Trustee addressed 2 of the Vacuum Boxes) wastes disposed. All original Vacuum Box have been removed from the site (Trustee gave boxes to C4 Environmental if they paid for cleaning).
- Roll-Off Boxes (original): 2 of 2 Roll-Off Boxes (Trustee addressed 1 of the Roll-Off Boxes). All original Roll-Off Boxes have been removed from the Site. (Trustee gave boxes to C4 Environmental if they paid for cleaning).
- Frac Tanks (original): Waste removed from 11 of 12 frac tanks (3 of 12 were originally empty), These frac tanks will continue to be used for the continuing processing of on-site wastes as necessary (EPA in process of having Dana Transport and Dynamic Rental pick up 3 of the Frac Tanks on northern portion of facility.) FT1004 has provided us with disposal difficulties do to odor.
- Aboveground Storage Tanks (ASTs): Liquids have been removed from 15 or 23
 ASTs. Sludge has been removed from 8 of 23 ASTs and this process continues.
 Awaiting waste acceptance by disposal facility on 7 of 23 ASTs.
- Main Warehouse Loading Bays: The bays have been cleared of debris and wastes;
- Main Warehouse Waste Water Treatment Area: Secondary containment has been partially cleaned;
- Totes/Drums/Misc Containers: Have been segregated by empty/non-empty. The empties have been staged for cleaning (pressure washing). Those with contents have been sampled/field analyzed. Data is being evaluated to prepare a bulking plan for disposal;
- Removal of Contaminated Sediments/Solids: This activity has been completed to the point where storm water (after inspection for sheen) can be allowed to be released normally. Silt barriers and oil absorbent boom are in place to reduce any potential residual contamination;
- Management of storm water: This activity continues as rainfall occurrs. Contaminated storm water is to drain normally from the site except for the southern portion of the property. The City of Houston sanitary sewer is available should the need arise due to a storm event;
- Waste Piles: Trustee removed wastes dumped to the ground in March 2014 from the theft of 7 roll-off boxes;
- Lab Chemicals/Company Profile Samples: Trustee consolidated and disposed;
- Bulk Process Chemicals: Trustee collected and disposed;

Estimated Contractor Costs as of 1/9/15:

EPA Removal Action - \$ 973,302

EPA Removal Assessment - \$ 212,409



EPA CES ER - \$ Don't have that information handy at this point

Gary Moore

Federal On-Scene Coordinator U.S. EPA Region 6 214-789-1627 cell 214-665-6609 office moore.gary@epa.gov

From: Terry Andrews

Sent: Tuesday, January 20, 2015 9:28 AM

To: Moore, Gary

Subject: CES update needed

Hi Gary,

I have a meeting at 2:00 today with Lubrizol's environmental contractor to discuss their VCP application. They want to be appraised of what waste has been disposed since the community meeting (which Brenda attended). Could you give me a list or tell me where I could find that info? Thanks.

Terry